

EXHIBIT "C"



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March 7, 2024

VIA EMAIL & US MAIL

Thomas J. Carroll, Esquire
Law Office of Thomas J. Carroll
224 King Street
Pottsville, PA 19464

**Re: County of Fulton, et al. v. Dominion Voting Systems, Inc., et al.
No. 1:22-CV-01639-SHR**

Dear Attorney Carroll:

Please be advised that we intend to file the enclosed Defendants' Revised Motion for Sanctions Pursuant to Rule 11 of the Federal Rules of Civil Procedure on March 29, 2024, unless the Plaintiffs discontinue with prejudice the above referenced action within twenty-one days of service of this letter and the enclosed motion. If Plaintiffs discontinue the action with prejudice in its entirety during that time period, no motion will be filed. If the matter is not discontinued, we will file the motion as a contested motion, unless you otherwise advise within the twenty-one day period that your clients concur in the motion as presented.

The enclosed revised motion is intended to replace the previous motion filed with the Court on February 28, 2024, in order to avoid any issues associated with the previous motion's substantial compliance with the notice requirements set forth in Rule 11(c). We do not intend to file a brief in support of the previous motion, in order to allow it to be deemed withdrawn without prejudice pursuant to Local Rule 7.5. Pursuant to L.R. 7.3, "[i]f a supporting brief is not filed within the time provided by this rule the motion *shall be deemed to be withdrawn.*" (emphasis supplied).

Please feel free to call me if you wish to discuss the above in more detail.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michael W. Winfield".

Michael W. Winfield

Enclosure